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Farms, LLC a California limited liability company

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8 **UNITED STATES BANKRUPTCY COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN JOSE DIVISION**

11
12) CASE NO.: 15-51772
13 In re)
14) Jointly Administered with:
CORRALITOS FARMS, LLC, a) Case No. 5:15-bk-51771
California limited liability company) In re Santa Cruz Berry Farming, LLC
15 Debtor-In-Possession.)
16) **SECOND INTERIM APPLICATION FOR**
17) **FEES AND REIMBURSEMENT OF**
18) **EXPENSES BY THOMAS VOGELE &**
19) **ASSOCIATES, APC, COUNSEL FOR**
20) **DEBTOR IN POSSESSION CORRALITOS**
21) **FARMS, LLC; DECLARATIONS OF**
22) **THOMAS A. VOGELE, ESQ. AND ROBERT**
23) **F. KOONTZ IN SUPPORT THEREOF**
24)
25) Chapter 11
26) Courtroom: 3020
27) Date: October 20, 2016
28) Time: 10:30 a.m.

1 **SECOND INTERIM APPLICATION FOR COMPENSATION AND REIMBURSEMENT**
2 **OF EXPENSES BY THOMAS VOGELE & ASSOCIATES, GENERAL INSOLVENCY**
3 **COUNSEL TO CORRALITOS FARMS, LLC**

4 Thomas Vogele & Associates, APC (“TVA”, “Counsel” or “Applicant”) general
5 insolvency counsel for debtor, Corralitos Farms, LLC (the “Debtor”), hereby submits this second
6 fee application (the “Application”) seeking entry of an order (a) approving TVA’s allowance of
7 compensation for **\$46,917.81** in fees for professional services rendered and **\$922.90** in expenses
8 incurred from March 21, 2016, through September 19, 2016 (the “Application Period”), totaling
9 **\$47,840.71** (the “Requested Compensation”).

10 This Application is submitted pursuant to 11 U.S.C. § 330, Bankruptcy Local Rule 9029-1,
11 the Guidelines for Compensation and Expense Reimbursements of Professionals and Trustees of
12 the United States Bankruptcy Court for the Northern District of California (“Northern District
13 Guidelines”), and the Order Employing Thomas Vogele & Associates as general insolvency
14 counsel [Docket No. 37] entered on June 17, 2015, with effect as of May 25, 2015.

15 **A. NOTICE OF APPLICATION**

16 This Application has been transmitted to the Debtor for review and comment. Notice of
17 this Application is being served by mail on all creditors who have filed claims in this case and
18 other parties in interest, concurrently with its filing. Full copies of the Application (including its
19 exhibits) are being served by mail on the United States Trustee and all parties who have requested
20 special notice in this case. Applicant respectfully submits that the notice given satisfies all
21 applicable rules.

22 **B. BACKGROUND AND BASIS FOR RELIEF REQUESTED**

- 23 1. This case was commenced on May 25, 2015 (the “Petition Date”).
- 24 2. The date of entry of Order Approving the Firm’s Employment was June 17, 2015, with
25 an effective date of retention of May 25, 2015.
- 26 3. Total Fees Allowed or Paid to the Firm to Date (including Retainers):
 - 27 a. Retainers Received: The Firm was not paid a retainer; and

b. On April 21, 2016, this Court ordered TVA paid on an interim basis \$134,966.00 in fees and \$7,419.24 in expenses. [ECF No. 246].

4. Applicant's Interim Application covers the period of March 21, 2016 through September 20, 2016.

C. CASE STATUS

At the commencement of the case, Corralitos Farms, LLC ("Debtor") was non-operational, but held valuable farm and equipment leases actively used by its affiliate, Santa Cruz Berry Farming Company, LLC ("Santa Cruz"), to conduct all farming operations formerly conducted by Debtor. During the pendency of the case, Debtor did not have any farming operations. However, Debtor received sub-lease income, distributions from K& M Enterprises, LLC ("K&M") and the sale proceeds of its 4% membership interest in K& M. Debtor has resolved a turnover action against Lakeside Organic Gardens, LLC to recover the balance due on one sub-lease, and intends to sell its membership interest in Kanaka Peaks Research and unencumbered equipment to generate additional cash for the estate. Like Santa Cruz, Debtor has submitted a structured dismissal plan that pays administrative claimants in full and a dividend to unsecured creditors.

The amount of money on hand in the estate and the anticipated recovery for the estate resulting from a turnover action and the sale of property is set forth below:

- | | |
|---|---------------------------------|
| • Cash on hand @ 9/22/16 | \$ 160,379.96 |
| • <u>Sale of Kanaka Peaks Research, LLC</u> | <u>\$ 50,000.00¹</u> |

Estimated Total Available Estate Cash \$ 160,379.96

Debtor estimates administrative claims as set forth below:

- | | |
|--|---------------|
| • This Application | (\$47,840.71) |
| • Polis & Associates, APC fee application ² | (\$25,000.00) |
| • Janey Leonardich/Malatesta | (\$42,000.00) |
| • Balance of Packard/Stevens claim ³ | (\$27,027.44) |

¹ Estimate of value of membership interest. Actual value will be determined by auction.

² Estimated fees requested. Application will be filed by professional.

- Gurnee-Switzer (\$30,670.50)
- Franchise Tax Board (\$845.71)
- Balance of Brouwer claim (\$11,579.63)

Estimated Administrative Claims (\$184,963.99)

Estimated Funds for Unsecured Creditors \$ 0.00

D. SUMMARY OF FEES AND COST REIMBURSEMENT

From May 25, 2015, through September 19, 2016, TVA rendered the services described in this Fee Application and the billing statements attached hereto as Exhibit A. TVA also incurred the actual and necessary expenses itemized in the billing statement. TVA professionals expended a total of 162.15 hours rendering services to the Debtor during the Application Period, for which it seeks \$47,840.71 in compensation of which \$922.90 is expense reimbursement.

E. REQUIRED DISCLOSURE

TVA has received no payments to date and no promises for payment from any source for services rendered or yet to be rendered in any capacity whatsoever in connection with the matters covered by this application other than described herein. Further, there is no agreement or understanding between TVA and any other person for the sharing of compensation to be received for services rendered in this Chapter 11 Case.

This is TVA's second interim fee application. On or about April 27, 2016, this Court ruled on TVA's first interim application and allowed fees in the amount of \$134,966.00 and expenses of \$7,419.24. [ECF No. 246]. TVA was paid the fees pursuant to the Court's order.

The hourly rates charged by TVA are the customary rates charged by comparably skilled practitioners in cases. TVA's rates in this case are not greater than those charged to other similar clients. The names and hourly rates of the professionals of TVA, who billed time for the period covered by this Fee Application are as follows:

³ Balance remaining after partial payment in Santa Cruz case.

Timekeeper	Hourly Rate	Hours	Total Fees
Thomas A. Vogele – Principal	\$350.00	53.7	\$18,795.00
Marisa D. Poulos – Sr. Associate	\$300.00	71.2	\$21,360.00
Brendan M. Loper - Associate	\$275.00	13.6	\$3,740.00
Angela M. Brown – Paralegal	\$125.00	23.65	\$3,022.81
TOTAL		162.15	\$46,917.81

Ms. Brown’s fees, billed as a paralegal, are compensable under the Northern California Guidelines. (a) Her time was spent in case administration which otherwise would have had to be undertaken by an attorney at a substantially higher rate. (b) She earned has a Bachelor of Arts in legal studies from Keiser University in 2004, has been a certified paralegal for thirteen (13) years and has experience in bankruptcy cases for the past six (6) years. Vogele Decl. ¶ 9.

As indicated under Northern District Guidelines, TVA has presented its work according to project categories. The following chart summarizes the project billing categories. Following that is a narrative summary of the activities conducted in each project category:

TASK CODE	TASK CODE CATEGORY	TOTAL HOURS BILLED	TOTAL FEES BILLED
B110	Case Administration	22.15	\$ 3,721.25
B120	Asset Analysis and Recovery	7.40	\$2,575.00
B130	Asset Disposition	8.0	\$2,800.00
B160	Fee/Employment Applications	34.7	\$10,280.00
B170	Fee/Employment Objections	2.1	\$735.00
B190	Other Contested Matters	16.00	\$4,855.00
B195	Non-Working Travel	3.2	\$1,120.00
B200	Work Related Travel	2.0	\$700.00

B240	Tax Issues	.3	\$105.00
B310	Claim Administration and Objection	49.6	\$15,825.00
E106	Online Research (PACER)		\$165.10
E107	Delivery Services/Messengers		\$399.24
E108	Postage		\$87.12
E110	Out of Town Travel		\$13.00
E124	Other (Document review)		\$325.00
	Total This Application		\$47,840.71

F. SUMMARY OF SERVICES BY CATEGORY

The following summary briefly describes rendered by TVA to the Debtor during the Fee Period, by matter and project category. The summary includes the hours and fees attributable to that project category. Detailed descriptions of the day-to-day services provided by TVA and the time expended performing such services in each project billing category are fully set forth in the billing statements attached hereto as Exhibit "A". Those detailed descriptions include indications of the professionals who rendered the services related to each of the task codes set forth.

1. Case Administration (B110): Fees: \$3,721.25; Total Hours: 23.15.

This category includes coordination and compliance matters, including preparation of statement of financial affairs and schedules, time spent addressing general case administration issues, updating case materials with monthly operating reports, preparing documents in support of fee applications, and responding to information inquiries.

2. Asset Analysis and Recovery (B120): Fees \$2,575.00; Total Hours: 7.4.

This category includes review and analysis of Debtor's equipment and analysis of the valuation of Corralitos' K&M and Kanaka Peaks membership interests. Time was also spent negotiating with K&M's counsel and negotiating the Lakeside and Nationwide settlement agreements.

3. Asset Disposition (B130): Fees: \$2,800.00; Total Hours: 8.0.

This category includes work related to asset disposition, including the review of asset information in preparation of motion to sell equipment, communication regarding sale of equipment and Kanaka Peaks membership interest, participation in Court hearing regarding sale motion hearing on equipment and meetings with prospective bidders.

4. Fee/Employment Application (B160): Fees: \$10,280.00; Total Hours: 34.7.

This category includes time spent preparing the First Interim and Final Fee Applications for Thomas Vogeles & Associates as Debtor's general insolvency counsel, reviewing Cal Coastal's objection to employment application, conducting research in support of opposition and reply to fee applications.

5. Fee/Employment Objections (B170): Fees: \$735.00; Total Hours: 2.1.

This category includes the preparation and review of reply to fee application.

6. Other Contested Matters (excluding assumption/rejection motions) (B190): Fees: \$4,855.00; Total Hours: 16.0.

This category includes the analysis and preparation of all other complaints, motions, opposition to motions and reply memoranda, including Debtor's adversary claims against Lakeside for turnover of funds and preparation of settlement documents.

7. Non-Working Travel (B195): Fees: \$2,100.00; Hours: 3.2

This category includes time billed for travel to San Jose for hearings and meetings with US Trustee and creditors.

8. Tax Issues (B240): Fees: \$105.00; Hours: .3

This category includes communications with tax counsel regarding tax claims against the Debtor.

1 9. Claims Administrations and Objections (B310): Fees: \$15,825.00; Hours: 49.6.

2 This category includes the preparation of objections to creditor Packard/Stevens/Burnett
3 and Gurnee/Switzer's proof of claims, among others and attendance at hearings on objections to
4 proof of claims.

5 **G. VALUATION OF SERVICES**

6 TVA's professionals have expended a total of 162.15 hours rendering professional services
7 to or on behalf of the Debtor in connection with this Chapter case during the Fee Period, as
8 detailed in the Summary of Professionals chart set forth above. The nature of the work performed
9 by these individuals is fully set forth in the billing statements attached as Exhibit "A" hereto. The
10 hourly rates charged are TVA's normal hourly rate for work of this type in Chapter 11 cases.
11 Therefore, the reasonable value of the professional services rendered by TVA to or on behalf of
12 the Debtor-in Possession, including costs, during the Fee Period is \$47,840.71.

13 In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, it is
14 respectfully submitted that the Requested Compensation is fair and reasonable given (a) the
15 complexity of this Chapter 11 Case, (b) the time expended, (c) the nature and extent of the services
16 rendered, (d) the value of such services, and (e) the costs of comparable services in a case other
17 than under this title.

18 **CONCLUSION**

19 Wherefore, TVA respectfully requests that the Court enter an order (a) approving the
20 allowance and authorizing payment to TVA of compensation in the amount of \$46,917.81 in fees
21 incurred for necessary professional services rendered and \$922.90 as reimbursement of actual,
22 reasonable and necessary costs and expenses paid during the fee period from March 21, 2016,
23 through September 19, 2016, for a total of \$47,840.71 and for such other and further relief as the
24 Court may deem just and proper.

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DATED: September 22, 2016

THOMAS VOGELE & ASSOCIATES, APC

By: /s/ Thomas A. Vogele
Thomas A. Vogele
Marisa D. Poulos
Attorneys for debtor Corralitos Farms, LLC

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SECOND INTERIM APPLICATION FOR FEES AND REIMBURSEMENT OF EXPENSES BY
THOMAS VOGELE & ASSOCIATES, APC

CERTIFICATION

I, Thomas A. Vogele, declare that I am the “Certifying Professional” designated by Thomas Vogele & Associates, APC for the purposes of this Fee Application to make the certifications required by the Northern District Guidelines. During the Fee Period, I have been the individual at TVA principally responsible for the firm’s engagement with the Debtor.

(a) I have read the application;

(b) to the best of my knowledge, information and belief, formed after reasonable inquiry, the compensation and expense reimbursement sought is in conformity with these guidelines, except as specifically noted in the certification application (no exceptions to note); and

(c) the compensation and expense reimbursement requested are billed at rates, in accordance with practices, no less favorable than those customarily employed by the applicant and generally accepted by the applicant’s clients.

DATED: SEPTEMBER 22, 2016

/s/ Thomas Vogele
Thomas Vogele

DECLARATION OF ROBERT KOONTZ

I, Robert Koontz, declare as follows:

1. I am the manager and 50% member of Santa Cruz Berry Farming Co., LLC (“**Santa Cruz Berry**”), the Chapter 11 debtor in this matter, and the manager and 33.33% member of Corralitos Farms, LLC (“**Corralitos**”), the Chapter 11 debtor in a separate case filed on the same day before this Court (collectively, “**Debtors**”). I have personal knowledge of the matters stated herein and, if called as a witness and sworn, could and would competently testify thereto. I do not intend to waive attorney-client privilege by submitting this declaration.

3. I have been actively engaged in farming of strawberries since 1995 and the Manager of Santa Cruz since its formation in 2010. I believe my expertise and knowledge of the strawberry farming business is substantial and sufficient to allow me to opine on the matters set forth herein.

4. Santa Cruz was formed in May 2010 by me and my brother Andrew to serve as a marketing arm for Corralitos and other small growers, subcontracting with the other strawberry growers to sell their fruit under the Santa Cruz label. At its peak, Santa Cruz was working with growers in Santa Cruz, Monterey, Santa Maria, Santa Barbara and Orange Counties. Santa Cruz arranged exclusive marketing agreements with Tom Lange Company, Inc. by which it served as growers’ agent on a 6.5% fixed commission basis.

5. Corralitos ceased all farming operations in or about October 2014, when it simply ran out of money, at which time its sole revenues were derived from its minority ownership interests in two limited liability companies, K&M Enterprises, LLC, a cooler of fruit, and Kanaka Peaks Research, LLC, a company doing research into best practices and yield maximization for organic strawberries. Corralitos had a six-figure negative bank balance, was unable to acquire plants on credit, its non-vendor borrowing capacity was exhausted and a decision was made to shut down Corralitos and allow Santa Cruz to take over the farming operations, since it had been

1 funding Corralitos in that regard for years. Santa Cruz had the ability to acquire plants and the
2 necessary materials to prepare for the 2015 growing season, albeit later than desirable.

3 6. Because Corralitos was unable to spend the money to prepare the ground, purchase
4 plants and prepare for the 2015 season on a normal time frame, Santa Cruz efforts to salvage the
5 2015 season did not commence until late 2014 and early 2015. This meant that Santa Cruz' crop
6 was planted late (in December 2014 and January 2015) and thus matured later than other growers.
7 This proved to be both a blessing and a curse, as Santa Cruz missed much of the early part of the
8 selling season because it had no fruit to sell, but when other growers were abandoning their crops
9 in August and September to prepare the ground for the 2016 season, Santa Cruz had ample
10 supplies of fresh berries for sale. This resulted in strong prices for Santa Cruz berries in
11 September and October.

12 7. I retained TVA as insolvency counsel, in April 2015. I have reviewed TVA's
13 billing statements and this Second Interim Allocation for Fees and Costs and believe that the
14 services provided were necessary and beneficial to me as well as my creditors. I believe the rates
15 charged by TVA for time expended by the various professionals to be fair and I am informed and
16 believe comparable to what other firms charge for such legal services. I believe the quality of
17 legal advice and services provided by TVA to be excellent and I support its First Interim
18 Application for Fees and Costs and request the Court to approve it as submitted.

19 I declare under penalty of perjury under the laws of California, that the foregoing is true and
20 correct.

21 Executed at Watsonville, California, on September 22, 2016.

22 /s/ Robert F. Koontz
23 Robert F. Koontz
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DECLARATION OF THOMAS A. VOGELE

I, Thomas A. Vogele, declare as follows:

1. I am an attorney duly licensed to practice law before all the courts of the State of California and all U.S. District and Bankruptcy Courts for the Central, Southern, Northern and Eastern Districts for the State of California. I am the founder and a principal of Thomas Vogele & Associates, APC ("TVA"), attorneys of record for Santa Cruz Berry Farming Company, LLC, a California Limited Liability Company ("Santa Cruz"), and the Chapter 11 debtor in this action. TVA derives approximately 40-50% of its fees from bankruptcy matters, including Chapter 7 trustee and Chapter 7 and Chapter 11 and debtor representation, reorganization and insolvency law.

2. I submit this supplemental declaration in support of TVA's Second Interim Application for Fees and Reimbursement of Expenses ("Second Interim Application"). I have personal knowledge of the facts set forth below and if called upon to testify as to those facts, could and would competently testify thereto.

3. The Application accurately sets forth the terms of the employment of TVA and the services rendered by the firm in this case. The Application complies with the Guidelines of the Office of the United States Trustee.

4. In compliance with the United States Trustee's Guidelines, the notice of the hearing on the fee application and request for comments regarding the fees and expenses being sought that was sent to Debtor, Santa Cruz Berry Farming Company, LLC. In addition, TVA has provided debtor with a copy of this Application. Likewise, notice of this Fee Application was served by mail on all creditors who have filed claims in this case and other parties in interest, concurrently with its filing. Full copies of the Fee Application (including its exhibits) are being served by mail on the United States Trustee and all parties who have requested special notice in this case.

5. Attached hereto as **Exhibit "A"** is TVA's time and billing statements for March 21, 2016 through September 19, 2016.

6. TVA professionals contemporaneously record all time using Pro Law software by Thompson Reuters. Time is recorded in tenths of an hour (6 minute) increments. All expenses are billed at cost, including documents accessed through PACER. TVA charges \$.05 per page for copies, however, TVA does not charge for faxes, local or long-distance telephone charges, or on-line legal research.

7. TVA has filed a first interim fee application and the Court authorized compensation and reimbursement of expenses to TVA in the amount of \$134,966.00 in fees and \$7,419.24 in expenses. [ECF No. 246.]. TVA received no retainer from the Debtor.

8. No agreement has been made by any member of TVA or by any employee thereof, directly or indirectly, and no understanding exists for a division or sharing of the fees requested by TVA as set forth in the Fee Application, with any other person. TVA has not entered into any agreement, written or oral, express or implied, with any other party or party in interest in the above-entitled case for the purpose of fixing the amount of any fees or compensation to be paid from the assets of the Partnership's estate. All services for which compensation is sought were rendered by TVA. No agreement has been made by any member of TVA or by any employee thereof, directly or indirectly, and no understanding exists for a division of fees paid for herein with any other person. TVA has not entered into any agreement, written or oral, express or implied, with any other party or party in interest in the above-entitled case for the purpose of fixing the amount of any fees or compensation to be paid from the assets of the Debtor's bankruptcy estate.

9. I am a principal and founder of TVA. Marisa D. Poulos and Brendan M. Loper are associate attorneys of the firm that billed hours in this case. Attached hereto and incorporated by reference herein as **Exhibit “B”** are brief biographies for each. TVA’s certified paralegal, Angela M. Brown, performed many of the administrative tasks in the bankruptcy. Ms. Brown has a Bachelor of Arts in legal studies from Keiser University in 2004, has been a certified paralegal for thirteen (13) years and has extensive experience in bankruptcy court procedures.

1 I declare under penalty of perjury under the laws of California that the foregoing is true and
2 correct.

3 Executed at Costa Mesa, California, on September 22, 2016.
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5 /s/ Thomas A. Voge
6 Thomas A. Voge
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**SECOND INTERIM APPLICATION FOR FEES AND REIMBURSEMENT OF EXPENSES BY
THOMAS VOGEL & ASSOCIATES, APC**

EXHIBIT A



Thomas Vogele & Associates, APC

3199 Airport Loop Drive, Suite A3
Costa Mesa, CA 92626
(714)641-1232

Invoice as of July 31, 2016

Invoice No. 6566

Corralitos Farms
Robert Fritz Koontz
116 Martinelli Street, Suite 7
Watsonville, CA 95077
2093-002: In re Corralitos Farms, LLC

Professional Fees			Hours	Rate	Task Code	Amount
3/1/2016	AMB	Obtain current claim register; update case materials; prepare email to M. Poulos regarding IRS claim (0.5); discussion with M. Poulos; prepare email to M. Poulos with attached EDD claims (0.4).	.90	125.00	B100	112.50
3/7/2016	AMB	Reformat Declaration of R. Koontz; prepare email to M. Poulos regarding status (0.5).	.50	125.00	B100	62.50
3/14/2016	AMB	Prepare email to M. Poulos regarding client Declaration for EDD; prepare email to client regarding signature page; several emails to client regarding same (0.3); prepare email to EDD with attached Declaration of R. Koontz regarding claim; prepare email to T. Vogele regarding stats (0.4).	.70	125.00	B110	87.50
3/15/2016	AMB	Discussion with T. Vogele; prepare email to T. Vogele with attached billing codes for bankruptcy matters (0.5).	.50	125.00	B110	62.50
3/16/2016	AMB	Admin - review court docket; update case calendar; update team calendars; update soft calendar regarding Motion to Sell Property [Cont from 12/3, 12/10, 2/10] (0.5).	.50	125.00	B110	62.50
3/17/2016	AMB	Review task codes; prepare email to J. Knowles regarding same (0.6);	1.30	125.00	B110	162.50

		review and revise fee app; prepare email to M. Poulos regarding status (0.7).				
3/18/2016	AMB	Admin - review court docket; update case calendar; update team calendars; update soft calendar regarding Polis - Motion to Sell Property [Cont from 12/3, 12/10, 2/1]; Polis - Motion re Sale of Membership Interests; Polis - Motion re Sale of Membership Interest - Kanaka Peaks; Settlement Conference; Polis - Motion re Sale of Membership Interests K&M (0.8); admin - review court docket; update case calendar; update team calendars; update soft calendar regarding Hearing on the approval of a compromise or settlement (other than approval of an agreement pursuant to FRBP 4001(d)). (0.5); discussion with T. Vogeles; prepare email to T. Vogeles with attached December statements (0.3); review rules; discussion with B. Loper; prepare email to T. Vogeles regarding notice (0.3).	1.90	125.00	B110	237.50
3/21/2016	MDP	Telephone call with T. Vogeles regarding fee application and review and revise same (1.7).	1.70	300.00	B160	510.00
3/21/2016	TAV	Finish fee application (3.8).	3.80	350.00	B160	1,330.00
3/22/2016	AMB	Review and respond to email from K. Marrero; prepare email to T. Vogeles regarding same (0.5).	.50	125.00	B110	62.50
3/22/2016	MDP	Review and revise fee applications and send email to client regarding same (1.4).	1.40	300.00	B160	420.00
3/23/2016	AMB	Prepare email to T. Vogeles regarding notice (0.3); prepare email to client with attached Declaration for fee app (0.5); prepare fee app for bankruptcy court; prepare proof of service; prepare correspondence to judge; prepare fee app for CPA regarding same; prepare email to counsel and creditors (0.6); several emails to team regarding status of fee apps (0.3); several emails to team regarding status of fee apps (0.35).	2.05	125.00	B110	256.25
3/23/2016	MDP	Review and revise notice for fee	3.80	300.00	B160	1,140.00

		application, fee applications, exhibits and supporting documents (3.8).				
3/26/2016	AMB	Update case materials with documents received (0.3).	.30	125.00	B110	37.50
3/30/2016	AMB	Admin - review court docket; update case calendar; update team calendars; update soft calendar regarding Motion to Sell Property [Cont from 12/3, 12/10, 2/1] (0.5).	.50	125.00	B110	62.50
3/31/2016	AMB	Prepare email to T. Vogele regarding Brouwer Admin Stip (0.3); prepare admin bar date motion for bankruptcy court; prepare notice; prepare proposed order; prepare proof of service; prepare correspondence to judge; scan documents and update case materials; prepare email to counsel and creditors (0.8).	1.10	125.00	B110	137.50
4/1/2016	AMB	Discussion with T. Vogele; prepare email in response to defective order (0.5); discussion with T. Vogele; review Brouwer stipulation; prepare email to T. Vogele regarding hearing date; prepare email to B. Loper with attached stipulation (0.5); prepare email to T. Vogele regarding order for Brouwer stipulation (0.3).	1.30	125.00	B110	162.50
4/1/2016	TAV	Emails to/from opposing counsel (Niles) regarding stipulation to pay admin claim; telephone call to same regarding same (0.4).	.40	350.00	B310	140.00
4/4/2016	TAV	Multiple telephone calls with Central West regarding purchase of trucks, both CF and ones with liens; telephone call with lenders regarding same, stipulation for surrender (0.9).	.90	350.00	B130	315.00
4/4/2016	TAV	Emails to/from Koontz regarding EDD admin claim, possible reduction or withdrawal (0.2).	.20	350.00	B310	70.00
4/5/2016	AMB	Discussion with T. Vogele; prepare email to counsel with attached stipulation (0.5); discussion with T. Vogele regarding American Express account; discussion with client regarding same (0.5).	1.00	125.00	B110	125.00
4/6/2016	TAV	Finish MOR for March, read and review bank statements and wire	.60	350.00	B100	210.00

		transfers to trust account (0.6).				
4/6/2016	TAV	Read and review admin claims filed in case; telephone call with opposing counsel (Niles) regarding compromise of claim by stipulation (0.2); read and review emails from opposing counsel (Dumas) regarding admin claim including repairs and cleanup; research right to same; telephone call with T. Polis regarding Ninth Circuit law (1.6).	1.80	350.00	B310	630.00
4/7/2016	AMB	Prepare email to T. Polis regarding signature (0.3).	.30	125.00	B110	37.50
4/7/2016	TAV	Emails to/from opposing counsel (Dumas) regarding demand for payment of claim from CF, telephone call with T. Polis regarding same; research FRCP 60 motion to modify order (0.9); prepare proposed admin claim form and letter regarding bar date, discuss same with T. Polis (0.6).	1.50	350.00	B310	525.00
4/8/2016	BML	Review Cal Coastal objection to employment application and review time entries for any duplicative billing; email to T. Vogele and A. Brown regarding the same (1.7).	1.70	275.00	B160	467.50
4/8/2016	TAV	Read and review emails from opposing counsel (Guenthyer) regarding Gurnee/Switzer admin claim, respond to same; read and review documents sent by Guenther regarding water and tax bills (0.3); read and review multiple emails from opposing counsel (Dumas) regarding admin claim and threat to oppose fee applications unless we immediately pay her client's approved claim in CF case; (0.6); read and review email from opposing counsel (Niles) regarding Brouwer admin claim and potential stipulation (0.2).	1.10	350.00	B310	385.00
4/9/2016	TAV	Read and review email from opposing counsel (Dumas) regarding Packard admin claim, respond to same; telephone call with T. Polis regarding opposition to admin claim; telephone call with F. Koontz regarding well repairs (0.6).	.60	350.00	B310	210.00
4/10/2016	AMB	Prepare email to counsel with	.50	125.00	B110	62.50

		attached monthly operating report for January 2016, February 2016 (0.5).				
4/11/2016	TAV	Read and review prior MOR reports and start drafting March MOR (0.4).	.40	350.00	B100	140.00
4/11/2016	TAV	Email to opposing counsel (Dumas) regarding admin claim (0.1); email to/from opposing counsel (Niles) about potential admin claim stipulation (0.1).	.20	350.00	B310	70.00
4/12/2016	AMB	Admin - review court docket; update case and team calendars regarding regarding Polis - Motion to Sell Property [Cont from 12/3, 12/10, 2/1, 4/11 [Polis WD]] (0.5); prepare email to T. Polis wiht attached confidentiality agreement (0.3); discussion with T. Voge regarding Packard/Stephens Claims (0.3).	1.10	125.00	B110	137.50
4/13/2016	BML	Work on drafting reply in support of fee applications (3.9); legal research regarding reasonableness of fees for reply in support of fee applications (1.5); phone call with special litigation counsel regarding opposition to fee applications (0.3); outline opposition and reply regarding fee application (1.2).	6.90	275.00	B160	1,897.50
4/13/2016	MDP	Review and revise adversary complaint; emails to T. Polis regarding same (1.4).	1.40	300.00	B190	420.00
4/14/2016	AMB	Prepare reply in support of fee application for district court; prepare proof of service; prepare correspondence to judge (1).	1.00	125.00	B110	125.00
4/14/2016	BML	Continued drafting reply in support of fee applications (4.2).	4.20	275.00	B160	1,155.00
4/14/2016	TAV	Read and review multiple draft replies to Anastassiou opposition to fee application, make revisions thereto (2.1).	2.10	350.00	B170	735.00
4/15/2016	AMB	Prepare email to counsel with attached reply (0.5).	.50	125.00	B110	62.50
4/15/2016	TAV	Telephone call with tax counsel regarding EDD and TFRP claims against Corralitos (0.3).	.30	350.00	B240	105.00
4/15/2016	TAV	Telephone call with CPA regarding fee applications; read and review email from creditors regarding bar date (0.3).	.30	350.00	B100	105.00

4/20/2016	TAV	Read and review email from okpc (Anastassiou) regarding settlement payment; email to same regarding same; email to L. Gomez regarding updated A/R and A/P; initiate wire transfer (0.2).	.20	350.00	B190	70.00
4/20/2016	TAV	Prepare estimated admin claim matrix, review A/P and A/R reports, communicate with opposing counsel (Anatssiou) regarding wire transfer (0.2).	.20	350.00	B100	70.00
4/21/2016	TAV	Travel to and from hearing in San Jose (2 hours each way) x 50% shared with Santa Cruz (2).	2.00	350.00	B200	700.00
4/21/2016	TAV	Prepare for and attend hearing on motion to set bar date (0.4); prepare for and attend hearing on fee application (0.4).	.80	350.00	B310	280.00
4/22/2016	AMB	Prepare email to T. Polis with attached proposed order for SCBF/CF/CPA (0.5); prepare proposed order regarding motion for administrative bar date (0.8); prepare letters, notices, forms regarding bar date and proof of claim; mailing (0.6).	1.90	125.00	B110	237.50
4/22/2016	TAV	Telephone call with F. Koontz regarding possible information regarding "missing" equipment claimed by Cal Coastal (0.2); send multiple emails (3) to opposing counsel (Anastassiou) regarding information regarding "missing" Cal Coastal equipment (0.3); read and review multiple email (3) from opposing counsel (Anastassiou) regarding demand for inspection of files (0.3).	.80	350.00	B130	280.00
4/22/2016	TAV	Email to L. Gomez regarding bank statements and check register for MOR_March (0.1).	.10	350.00	B110	35.00
4/25/2016	AMB	Discussion with T. Vogele; Research trucks for value (1.5).	1.50	125.00	A102	187.50
4/25/2016	TAV	Read and review email from opposing counsel (Guenther) regarding admin claim issues; respond to same (0.3).	.30	350.00	B310	105.00
4/25/2016	TAV	Read and review draft adversary complaint for turnover of estate property (Lakeside); revise same (0.4).	.40	350.00	B190	140.00

4/25/2016	TAV	Review asset information from client (trucks) in preparation for motion to sell, research values of same (0.5).	.50	350.00	B130	175.00
4/26/2016	AMB	Research truck auction locations; prepare email to T. Vogeles regarding same (0.8).	.80	125.00	B110	100.00
4/26/2016	TAV	Read and review adversary complaint after revisions, discuss same with M. Poulos; review emails from opposing counsel (Smith) regarding dispute (0.4).	.40	350.00	B120	140.00
4/27/2016	TAV	Telephone call with T. Polis regarding admin claim of Gurnee/Switzer in Corralitos Farms case, plan to object as no benefit to case (0.2); email to opposing counsel (Niles) regarding stipulation for allowed claim of Doug Brouwer (0.2).	.40	350.00	B310	140.00
4/27/2016	TAV	Telephone call with T. Polis regarding sale of Kanaka Peaks, estoppel issues vis-a-vis statements in tax returns filed by KPR (0.3).	.30	350.00	B130	105.00
4/28/2016	MDP	Review and revise complaint for turnover, emails to T. Polis regarding same (1.5).	1.50	300.00	B190	450.00
4/28/2016	TAV	Read and review emails from admin creditors regarding claim process, respond to same (0.3).	.30	350.00	B310	105.00
4/29/2016	AMB	Research issuance of summons (0.5); discussion with T. Vogeles; prepare email to T. Vogeles with attached complaint for turnover (0.5).	1.00	125.00	B110	125.00
4/29/2016	MDP	Finalize complaint and email opposing counsel regarding settlement (1.8).	1.80	300.00	B190	540.00
4/29/2016	TAV	Read and review adversary complaint for turnover vs. Lakeside; read and review emails regarding same; telephone call with opposing counsel (Smith) regarding settlement and release (0.5).	.50	350.00	B190	175.00
5/2/2016	AMB	Review and respond to email from Armando Ramirez regarding 2012 Ford information (0.3); telephone call with Bar None and Truck Center regarding auctions; prepare email to T. Vogeles regarding results	.80	125.00	B100	100.00

		(0.5).				
5/2/2016	MDP	Prepare and draft release/settlement agreement (2.5).	2.50	300.00	B190	750.00
5/2/2016	TAV	Telephone call with opposing counsel (Niles) regarding administrative claim for rent (Brouwer) (0.3).	.30	350.00	B310	105.00
5/2/2016	TAV	Telephone calls with potential buyers for trucks (0.4).	.40	350.00	B120	140.00
5/4/2016	MDP	Review and revise Lakeside settlement agreement (0.3).	.30	300.00	B190	90.00
5/4/2016	TAV	Read and review proof of claim by Malatesta Ranch, defects and issues with amounts; email to T. Polis regarding options and best course of action; read and review proof of claim filed by Malatesta in July 2015, compare to new admin claim; read and review stipulation and order on stipulation regarding surrender of property (0.5).	.50	350.00	B310	175.00
5/4/2016	TAV	Read and review settlement and release agreement with Lakeside Gardens regarding unpaid rent and taxes; revise same (0.3).	.30	350.00	B120	105.00
5/5/2016	AMB	Prepare email to T. Voge with attached spreadsheets to prepare monthly operating reports (0.5); update case materials with Corralitos Lakeside release final; prepare email to M. Poulos regarding same (0.4).	.90	125.00	B100	112.50
5/5/2016	MDP	Review and revise settlement agreement; respond to emails from counsel regarding same (0.6).	.60	300.00	B310	180.00
5/5/2016	TAV	Draft and send email to opposing counsel (Luce) regarding objectionable claim; confirm no right to interest or fees/costs absent court determination (0.3); read and review proof of claims and claims register filed in CF (Case 15-51772); telephone call with EDD regarding amended claim (0.2).	.50	350.00	B310	175.00
5/6/2016	TAV	Read and review emails from opposing counsel (Luce) regarding proof of admin claim by Malatesta; discuss filing problems with A. Brown (0.3).	.30	350.00	B310	105.00
5/9/2016	TAV	Meet client at Rabobank to obtain	2.70	350.00	B120	945.00

		endorsement guarantees, discuss sale of IH to Central West and other equipment to JW Farms (0.4); travel to/from Watsonville to obtain checks and mail from Debtor, go to Rabobank to obtain endorsement guarantees; (2.1); telephone call with T. Polis regarding Kanaka Peaks sale, potential fraudulent transfer claims against Kanaka Peaks (0.2).				
5/9/2016	TAV	Read and review email from opposing counsel (Luce) regarding settlement of admin claim against CF by Malatesta; review legal authority cited in email (0.6).	.60	350.00	B310	210.00
5/9/2016	TAV	Prepare monthly operating reports for March and April 2016, review bank statements, reconcile cash to statements (0.1).	.10	350.00	B100	35.00
5/10/2016	TAV	Exchange emails with opposing counsel (Luce) regarding stipulated admin claim (0.2); update admin claim calculations. (0.2).	.40	350.00	B310	140.00
5/12/2016	MDP	Prepare and review email to and from Lakeside counsel regarding settlement agreement (0.3).	.30	300.00	B120	90.00
5/13/2016	TAV	Review admin claim by Packard/Stephens/Burnett and supporting declarations in support thereof, discuss objection regarding same with M. Poulos (0.4); research case law on 11 USC 503(b) - benefit to estate in connection with objection to admin claim (0.5).	.90	350.00	B310	315.00
5/17/2016	AMB	Prepare March and April operating reports for district court; prepare proof of service; prepare correspondence to judge; prepare email to creditors; update case materials (1.3).	1.30	125.00	B100	162.50
5/17/2016	TAV	Telephone call with T. Polis regarding claims objection to Packard/Stephens proof of claim for rent, water, well pump and cleaning and grubbing (0.2); read and review proof of claims filed by Gurnee/Switzer for rent, water and attorney fees; discuss objection grounds with T. Polis (0.6).	.80	350.00	B310	280.00

5/18/2016	AMB	Update case materials with monthly operating reports; prepare email to T. Vogeles regarding same and October report missing (0.8).	.80	125.00	B110	100.00
5/18/2016	MDP	Telephone call and emails with Packard's counsel, prepare and draft stipulation to continue hearing, telephone call with T. Vogeles regarding same (1.7).	1.70	300.00	B310	510.00
5/18/2016	TAV	Read and review emails between M. Poulos and opposing counsel (Dumas) regarding hearing date (0.2); review final administrative claims register; start drafting objections to Packard/Stephens/Burnett and Gurnee/Switzer claims; discuss same with B. Loper and M. Poulos (0.6).	.80	350.00	B310	280.00
5/18/2016	TAV	Read and review email from UST regarding unpaid fees; respond to same (0.1).	.10	350.00	B100	35.00
5/18/2016	TAV	Multiple emails with opposing counsel (Kim) regarding GMC flatbeds surrendered in January 2016; telephone call to A. Ramirez regarding dates of surrender, other information for opposing counsel (Kim) (0.3).	.30	350.00	B130	105.00
5/19/2016	MDP	Review and revise stipulation; review and respond to emails regarding same (0.4).	.40	300.00	B310	120.00
5/19/2016	TAV	Email to opposing counsel (Ernest) regarding sale of F650 water truck, stipulation for relief from stay and surrender (0.2).	.20	350.00	B130	70.00
5/19/2016	TAV	Email to F. Koontz regarding Lakeside settlement agreement execution; read and review emails from opposing counsel (Smith) regarding execution of agreement, respond to same (0.4).	.40	350.00	B120	140.00
5/19/2016	TAV	Review stipulation to continue hearing on Packard/Burnett/Stephens application for payment of admin claim and objection (0.2).	.20	350.00	B310	70.00
5/20/2016	TAV	Telephone call with Central West regarding purchase of vehicles (0.2).	.20	350.00	B120	70.00

5/23/2016	TAV	Telephone call with A. Ramirez regarding Lakeside Agreement; telephone call to F. Koontz regarding same (0.2).	.20	350.00	B130	70.00
5/24/2016	TAV	Email to opposing counsel (Smith) regarding Lakeside agreement; telephone call with F. Koontz regarding same (0.3).	.30	350.00	B120	105.00
5/25/2016	MDP	Review stipulations and finalize same (0.3).	.30	300.00	B310	90.00
5/27/2016	TAV	Telephone call with potential buyers of trucks; telephone call to Ford Motor Credit regarding same (0.4).	.40	350.00	B130	140.00
6/6/2016	MDP	Review and respond to emails regarding Lakeside settlement (0.2).	.20	300.00	B190	60.00
6/7/2016	TAV	Read and review multiple emails from/to opposing counsel (Smith) regarding final Lakeside settlement agreement (0.4).	.40	350.00	B120	140.00
6/8/2016	TAV	Travel to and meet with F. Koontz regarding status of Lakeside settlement, motion to sell trucks (2.1).	2.10	350.00	B130	735.00
6/8/2016	TAV	Meet with F. Koontz regarding structured dismissal and implications for case and administrative claims (1.7).	1.70	350.00	B100	595.00
6/17/2016	TAV	Telephone call with F. Koontz regarding Lakeside agreement status, motion to sell equipment (0.3).	.30	350.00	B130	105.00
6/20/2016	MDP	Continue to conduct research for preparation of objections to claims (1.8).	1.80	300.00	B310	540.00
6/21/2016	MDP	Conduct further research on administrative claim and begin to draft objection to same (3.5).	3.50	300.00	B310	1,050.00
6/22/2016	MDP	Review Gurnee/Switzer proof of claim (.2), conduct research regarding same (.9), prepare and draft same (1.7), review and respond to emails from T. Polis regarding same (.5) (3.3).	3.30	300.00	B310	990.00
6/23/2016	MDP	Review and revise objections to claim nos. 29-1 and 39-1, prepare and draft declarations in support thereof (2.3), telephone call with T. Polis regarding same (.1) (2.4).	2.40	300.00	B310	720.00

6/23/2016	TAV	Read and review motion to sell equipment (trucks), telephone call with T. Polis regarding same (0.3); telephone call with F. Koontz regarding sale of Kanaka Peaks membership interest, possible buyers, financial considerations (0.7).	1.00	350.00	B130	350.00
6/23/2016	TAV	Read and review objections to admin claims of Packard/Stevens/Burnett, discuss same with T. Polis (0.3); read and review objections to admin claims of Gurnee/Switzer, discuss same with T. Polis (0.4).	.70	350.00	B310	245.00
6/24/2016	MDP	Review research regarding packard claims objection (0.6).	.60	300.00	B310	180.00
6/27/2016	AMB	Prepare monthly operating reports; prepare email to creditors regarding same; prepare document for district court (0.7).	.70	125.00	B110	87.50
6/27/2016	MDP	Conduct research (1.5), continue to prepare and draft objection to Packard administrative claim (2.75) (4.2).	4.20	300.00	B310	1,260.00
6/28/2016	MDP	Continue to draft and revise objection to packard claim (3.9).	3.90	300.00	B310	1,170.00
6/29/2016	MDP	Finalize draft of objection to Packard administrative claim (0.8).	.80	300.00	B310	240.00
6/30/2016	MDP	Review and revise objection and prepare and draft declaration in support of objection (1.2).	1.20	300.00	B310	360.00
7/6/2016	TAV	Telephone call with T. Polis regarding objections to Packard/Stevens and Gurnee/Switzer admin claims (0.4).	.40	350.00	B310	140.00
7/7/2016	AMB	Prepare email to M. Aulenta with the attached settlement agreement (0.5).	.50	125.00	B100	62.50
7/7/2016	MDP	Review response to claim objection and supporting documents (0.4).	.40	300.00	B310	120.00
7/7/2016	TAV	Draft reply to Gurnee/Switzer response to CF objection to claim, review same with M. Poulos (0.3); telephone call with F. Koontz regarding objections to admin claims of Packard/Stevens/Burnett and Gurnee/switzer (0.6).	.90	350.00	B310	315.00
7/7/2016	TAV	Telephone call with F. Koontz regarding motion to sell equipment,	.40	350.00	B130	140.00

		Kanaka Peaks membership interest (0.4).				
7/8/2016	AMB	Review and respond to email from M. Poulos regarding documents up loaded in connection with Guenther's response to our objection to proof of claim (0.3).	.30	125.00	B110	37.50
7/8/2016	MDP	Review response to objection to Gurnee/Switzer admin claim; discuss scope of reply with T. Voge; begin to draft reply to same (1.3).	1.30	300.00	B310	390.00
7/8/2016	TAV	Read and review response to objection to Gurnee/Switzer admin claim, discuss same M. Poulos for reply arguments (0.6).	.60	350.00	B310	210.00
7/11/2016	AMB	Revise reply to to Gurnee response to objection regarding claim; prepare email to M. Poulos regarding status (0.7).	.70	125.00	B110	87.50
7/11/2016	MDP	Prepare and draft reply to response to objection to proof of claim; email with T. Polis regarding same (2.8).	2.80	300.00	B310	840.00
7/13/2016	MDP	Finalize changes to reply to response to objection to proof of claim, draft declaration in support of reply (1.5).	1.50	300.00	B310	450.00
7/14/2016	AMB	Review, revise and reformat Declarations because they relate to different claims, debtors, claim numbers; prepare reply and Declaration in support of; prepare proof of service; prepare correspondence to judge; prepare email to M. Poulos regarding status; prepare email to counsel; prepare email to creditors (2).	2.00	125.00	B110	250.00
7/16/2016	TAV	Draft status conference statement (1.1).	1.10	350.00	B110	385.00
7/19/2016	AMB	Prepare email to T. Polis regarding trucks (0.3).	.30	125.00	B110	37.50
7/20/2016	TAV	Multiple telephone calls with potential bidder regarding equipment auction; read and review emails from bidders; read and review text messages regarding same (0.6).	.60	350.00	B120	210.00
7/21/2016	TAV	Prepare for and attend hearing on claims objections (3) (2.5).	2.50	350.00	B310	875.00
7/21/2016	TAV	Prepare for and attend sale motion	.60	350.00	B130	210.00

		hearing on equipment; meet with prospective bidders before the hearing (0.6).				
7/21/2016	TAV	Travel to hearing on motion to sell, claims objections and status conference (3.2).	3.20	350.00	B195	1,120.00
7/22/2016	TAV	Telephone call with T. Polis regarding Kanaka Peaks Research, LLC sale, plans regarding inspection demand per § 17701.010(a)(1)(0.1).	.10	350.00	B120	35.00
7/22/2016	TAV	Review email from opposing counsel (Guenther) regarding admin claims; research assertion that check #3264 paid property taxes and refute; email to opposing counsel (Guenther) regarding actual amounts and allowed claims therefrom (0.6).	.60	350.00	B310	210.00
Sub-total Fees:						38,268.75

Rate Summary

Angela M. Brown	29.9500hours at \$	125.00/hr	3,743.75
Brendan M Loper	12.8000hours at \$	275.00/hr	3,520.00
Marisa D. Poulos	45.6000hours at \$	300.00/hr	13,680.00
Thomas A. Vogelee	49.5000hours at \$	350.00/hr	17,325.00
Total hours: 137.8500			

Expenses

		Units	Price	Amount
2/1/2016	Rebilled Legal Services: 2/1/2016 Ernest Mooney, Esq. participated in a conference call at Thomas Vogelee & Associates office regarding K&M Enterprises.	1.00	300.00	300.00
3/25/2016	Postage.	1.00	65.76	65.76
3/30/2016	Legal Research.	1.00	30.50	30.50
3/31/2016	Overnite Express: U. S. Trustee.	1.00	31.44	31.44
3/31/2016	Overnite Express: U. S. Courthouse, San Jose.	1.00	31.44	31.44
4/11/2016	Overnite Express: U. S. Trustee.	1.00	20.63	20.63
4/11/2016	Overnite Express: U. S. Courthouse, San Jose.	1.00	28.77	28.77
4/19/2016	Overnite Express: JAMS.	1.00	19.97	19.97
4/22/2016	Overnite Express: U. S. Trustee, San Jose.	1.00	32.18	32.18
4/22/2016	Overnite Express: U. S. Courthouse, San Jose.	1.00	20.63	20.63

4/29/2016	Overnite Express: U. S. Courthouse, San Jose.	1.00	32.18	32.18
5/17/2016	Overnite Express: United States Courthouse.	1.00	28.77	28.77
5/17/2016	Overnite Express: U. S. Trustee.	1.00	28.77	28.77
5/19/2016	Quarterly Trustee Fees.	1.00	325.00	325.00
5/31/2016	Postage.	1.00	21.36	21.36
6/26/2016	Legal Research.	1.00	134.60	134.60
7/14/2016	Overnite Express.	1.00	25.00	25.00
7/14/2016	Overnite Express.	1.00	32.90	32.90
7/21/2016	Parking Fee.	1.00	13.00	13.00

Sub-total Expenses: 1,222.90

Total Current Billing:	<u>39,491.65</u>
Previous Balance Due:	192,889.24
Total Payments:	0.00
Total Now Due:	<u>232,380.89</u>



Thomas Vogeles & Associates, APC

3199 Airport Loop Drive, Suite A3
Costa Mesa, CA 92626
(714)641-1232

Invoice as of August 31, 2016

Invoice No. 6636

Corralitos Farms
Robert Fritz Koontz
116 Martinelli Street, Suite 7
Watsonville, CA 95077

2093-002: In re Corralitos Farms, LLC

Professional Fees			Hours	Rate	Task Code	Amount
8/3/2016	MDP	Begin to prepare and draft second interim fee application, conduct research regarding same (2.6).	2.60	300.00	B160	780.00
8/4/2016	MDP	Conduct further research regarding structured dismissal motion (0.8).	.80	300.00	B190	240.00
8/10/2016	MDP	Begin to gather information to prepare fee application (1.5).	1.50	300.00	B160	450.00
8/15/2016	BML	Research regarding notice required in Northern District bankruptcy (0.8).	.80	275.00	B110	220.00
8/15/2016	MDP	Telephone calls with T. Vogeles and T. Polis regarding interim fee application, conduct research and continue to draft same (3.6).	3.60	300.00	B160	1,080.00
8/15/2016	TAV	Telephone call with T. Polis regarding Packard/Stevens/Burnett claim objection (0.3).	.30	350.00	B310	105.00
8/15/2016	TAV	Telephone call with T. Polis regarding Kanaka Peaks sale motion, financial information (0.3).	.30	350.00	B120	105.00
8/15/2016	TAV	Read and review motion for fees and costs (0.3).	.30	350.00	B100	105.00
8/16/2016	MDP	Review and revise fee application (.5), conduct research regarding structured dismissal (2.0) (2.5).	2.50	300.00	B160	750.00
8/16/2016	TAV	Prepare MORs; revise admin claim spreadsheet (1).	1.00	350.00	B100	350.00

8/17/2016	MDP	Begin to prepare and draft structured dismissal motion, telephone calls and email to T.Polis regarding same (2.5).	2.50	300.00	B110	750.00
8/17/2016	TAV	Finalize admin claims and fee application information, read and review fee app (1.3).	1.30	350.00	B100	455.00
8/18/2016	MDP	Continue to revise and draft structured dismissal, review recent docket entries and emails regarding same, conduct research regarding same (3.7).	3.70	300.00	B190	1,110.00
8/19/2016	MDP	Continue to prepare and draft motion to dismiss, prepare and draft supporting declaration (3.4).	3.40	300.00	A103	1,020.00
8/22/2016	MDP	Review and revise structured dismissal motion (0.8).	.80	300.00	A103	240.00
8/26/2016	MDP	Review and revise structured dismissal motion (1.4) , revise interim fee application 1.3 (2.7).	2.70	300.00	B190	810.00
8/29/2016	MDP	Revise second interim fee application (0.6).	.60	300.00	B160	180.00
8/30/2016	MDP	Review fee application and Nationwide Agribusiness costs, telephone call with T. Vogele regarding same (0.4).	.40	300.00	B160	120.00
8/30/2016	TAV	Telephone call with F. Koontz regarding sale of Kanaka Peaks Research membership interest (.50); telephone call with Dole Fresh Vegetables general counsel regarding Dole ROFR and interest in bidding on Kanaka Peaks interest (0.8).	.80	350.00	B120	280.00

Sub-total Fees: 9,150.00

Rate Summary

Brendan M Loper	0.8000hours at \$	275.00/hr	220.00
Marisa D. Poulos	25.1000hours at \$	300.00/hr	7,530.00
Thomas A. Vogele	4.0000hours at \$	350.00/hr	1,400.00
Total hours:	29.9000		

Expenses

		Units	Price	Amount
7/18/2016	Overnite Express.	1.00	30.42	30.42
7/18/2016	Overnite Express: U. S. Courthouse.	1.00	36.14	36.14
	Sub-total Expenses:			<u>66.56</u>

Total Current Billing:	<u>9,216.56</u>
Previous Balance Due:	232,380.89
Total Payments:	0.00
Total Now Due:	<u>241,597.45</u>



Thomas Vogeles & Associates, APC

3199 Airport Loop Drive, Suite A3
Costa Mesa, CA 92626
(714)641-1232

Invoice as of September 19, 2016

Invoice No. 6660

Corralitos Farms
Robert Fritz Koontz
116 Martinelli Street, Suite 7
Watsonville, CA 95077
2093-002: In re Corralitos Farms, LLC

Professional Fees			Hours	Rate	Task Code	Amount
9/14/2016	MDP	Review and revise structured settlement motion, email to T. Vogeles regarding same (0.5).	.50	300.00	A103	150.00
9/19/2016	TAV	Read and review emails from/to J. Namba regarding Kanaka Peaks financial information (0.2).	.20	350.00	B120	70.00
Sub-total Fees:						220.00

Rate Summary

Marisa D. Poulos	0.5000hours at \$	300.00/hr	150.00
Thomas A. Vogeles	0.2000hours at \$	350.00/hr	70.00
Total hours:	0.7000		

Total Current Billing:	220.00
Previous Balance Due:	241,597.45
Total Payments:	0.00
Total Now Due:	241,817.45

EXHIBIT B

Thomas A. Vogele, Esq.
Thomas Vogele & Associates, APC

Mr. Vogele is the founder and President of Thomas Vogele & Associates, APC. He attended law school at the age of 51 after a successful 30 year business career, including stints in the banking, manufacturing and consulting industries. He attended Northwestern University and the Kellogg Graduate School of Management before moving to California in 1980.

He began his legal career as a litigation and appellate associate with the Enterprise Counsel Group, ALC. At ECG, he successfully represented clients in a variety of litigation and appellate matters, including all aspects of pre-trial practice (written and electronic discovery, depositions and law and motion practice) as well as serving as first- and second-chair on civil trials and alternative dispute resolution. Because of his extensive business background and expertise, Mr. Vogele was selected to work on several important business cases for the firm.

In 2010, Mr. Vogele left ECG and formed a partnership focusing on complex civil litigation and appellate work for a limited number of sophisticated individual and business clients in Southern California. The firm grew rapidly and expanded its reach to include client matters in state and federal courts throughout California, Texas, Washington State and Alaska. The firm became TVA in 2012 and continues to focus on complex civil and bankruptcy litigation, appellate and transactional matters for individual and business clients.

Mr. Vogele has successfully tried cases in state and federal courts as well as state and federal appellate courts. His successful client outcomes include a seven-figure non-dischargeable judgment against a Ponzi scheme operator; an eight-figure settlement of a four-year partnership dispute; a defense judgment and affirmance on appeal in a complex civil case against 34 defendants; a defense judgment in a Nevada quiet title action; and a seven figure judgment in an elder abuse and conversion case in Monterey County.

Mr. Vogele graduated from Chapman University School of Law with numerous honors and awards. Mr. Vogele was a member of both the Moot Court Honors and Executive Boards, and the Mock Trial Board while at Chapman. He served as judicial extern to the Hon. Vincent P. Zurzolo, former Chief Judge of the United States Bankruptcy Court for the Central District of California, from 2005 to 2006. While working in chambers, Mr. Vogele helped draft the 2006 revisions to the Court's official form disclosure statement and plan of reorganization.

BAR ADMISSIONS & PROFESSIONAL AFFILIATIONS

- California Supreme Court; U.S. District Court and Bankruptcy Court for the Northern, Eastern, Central and Southern Districts of California
- Court of Appeals for the Ninth Circuit; Bankruptcy Appellate Panel (BAP) for the Ninth Circuit; and Court of Appeals for the Federal Circuit
- Admitted Pro Hac Vice for U.S. Bankruptcy Court for the Delaware District, the U.S. District Court for the Western District of Texas and the Nevada District Courts
- Orange County Bar Association, the Los Angeles County Bar Association, the Orange County Federal Bar Association, the Monterey County Bar Association and the International Trademark Association

Timothy M. Kowal, Esq.
Thomas Vogeles & Associates, APC

Timothy Kowal is a shareholder in Thomas Vogeles & Associates, APC. His practice focuses on civil litigation, including business and complex civil litigation. Mr. Kowal has worked with a variety of clients, including health care providers, manufacturers and distributors, real estate developers, and public interest advocates. He has also represented clients on a number of appellate matters in state and federal courts.

Mr. Kowal has participated in a number of public interest cases, including workplace harassment and retaliation claims with the EEOC under Title VII and GERA. Mr. Kowal was also instrumental in obtaining a judgment invalidating an illegal city contract worth more than \$20 million awarded in violation of fair bidding laws, and in obtaining a published decision requiring a quasi-public agency to disclose documents to city officials sitting as board members.

Prior to practicing law, Mr. Kowal helped start a successful IT sales and consulting firm in Orange County that continues to serve small businesses and individual customers in the region. Before joining Thomas Vogeles & Associates, Mr. Kowal was a litigation associate at Enterprise Counsel Group in Irvine. He is active in community and legal advocacy groups, and writes and speaks on policy and legal issues.

SELECTED DECISIONS

- *Choi v. Orange County Great Park Corp.* (2009) 175 Cal.App.4th 524.
- *Kelter v. Associated Financial Group, Inc.* (9th Cir. 2010) 382 Fed.Appx. 632, 634.
- *Nguyen v. Superior Court of Riverside County* (Hemet Community Medical Group), California Court of Appeal (2011)

BAR ADMISSIONS & PROFESSIONAL AFFILIATIONS

- California Supreme Court and U.S. District Court and Bankruptcy Court for the Central and Eastern Districts of California
- Court of Appeals for the Ninth Circuit; Court of Appeals for the Federal Circuit; and Bankruptcy Appellate Panel (BAP) for the Ninth Circuit;
- Board Member, Orange County Federalist Society, 2007 to present
- Commissioner, Orange County Human Relations Commission, May 2012 to present
- Board Member, Huntington Beach Tomorrow, January 2013 to present

PUBLICATIONS & PUBLIC APPEARANCES

- Who Will Redevelop Redevelopment?: Power and Pragmatism in California Redevelopment Law, 12 ALB. L. ENVTL. OUTLOOK J. 93 (2007)
- Rethinking Eminent Domain: The Restitutionary Approach to Just Compensation, 9 CHAP. L. REV. 463 (2006) (Winner, First Prize, Pacific Legal Foundation, Seventh Annual Judicial Awareness Writing Competition, 2006)

Brendan M. Loper, Esq.
Thomas Vogeles & Associates, APC

Brendan M. Loper joined TVA after graduating from the prestigious University of Virginia School of Law and worked as a law clerk before taking and passing the California Bar Exam in July 2011. Mr. Loper's practice focuses on civil litigation with an emphasis on bankruptcy litigation, including trustee and creditor representation.

Mr. Loper has served as second chair trial counsel in state court and been given significant responsibility for managing a large bankruptcy adversary matter in which TVA serves as Special Counsel to the Chapter 7 Trustee. In that matter, Mr. Loper was principally responsible for the Court's decision to deem a lender with a \$2.5 million deed of trust not to be a good-faith encumbrancer. He also was significantly involved in a successful motion for summary adjudication whereby the property of a qualified personal residence trust was deemed property of the debtor's estate. He has also represented individual debtors in bankruptcy court and successfully represented debtors in adversary proceedings.

Prior to attending the University Of Virginia School Of Law, Mr. Loper graduated cum laude from Claremont McKenna College with a dual BA in Literature and Philosophy, both with honors.

EDUCATION:

- University of Virginia School of Law, JD 2011
- Claremont McKenna College, BA, 2008

BAR ADMISSIONS & PROFESSIONAL AFFILIATIONS

- California Supreme Court; U.S. District Court and Bankruptcy Court for the Central and Northern Districts of California
- Bankruptcy Appellate Panel (BAP) for the Ninth Circuit
- Orange County Bar Association, the Los Angeles County Bar Association, and the Orange County Federal Bar Association

MARISA D. POULOS

19800 MacArthur Blvd., Suite 1000, Irvine, CA 92612 • 949-230-6008 • pouloslaw@yahoo.com

Work Experience

Polis & Associates, ALPC, Irvine, CA May 2014 - Present

Contract Attorney

Assisted lead bankruptcy counsel with various bankruptcy matters including law and motion, (fraudulent conveyance, avoidance actions, sale motions, turnover complaints, objections to exemptions, and objections to proof of claims). Various bankruptcy court appearances, including stay relief motions, status conferences, and evidentiary hearings. Also, handled non-bankruptcy state law and federal court for law suite co-tenants.

Enterprise Counsel Group, ALC, Irvine, CA February 2013 - April 2014

Associate

Provided litigation and transactional counsel to corporate and individual clients for contract disputes, business torts, lease preparation and negotiation, wage and hour disputes, unfair competition, medical malpractice, corporate governance, trade secrets and family law. Attended law and motion hearings, prepared complaints, attended depositions, performed research, drafted and responded to discovery requests and law and motion in federal and state courts.

Olen Properties Corporation, Newport Beach, CA

Associate Counsel

May 2011-February 2013

Represented corporate entities and principals in federal and state court litigation in connection with contract and real estate disputes, business torts and securities fraud. Researched and resolved a broad range of legal issues pertaining to the corporate entities. Prepared and drafted discovery, law and motion and all pre-trial documents for trial.

Orange County Superior Court May 2010 - Present

Judge Pro Tern

Temporary judge and settlement officer with the Orange County Superior Court. Receive evidence, preside and rule on various types of cases including small claims, traffic court trials and act as a settlement conference judge in civil cases.

DiCesare & Behle, LLP (and successor entities) Foley Bezek Behle & Curtis, LLP, Costa Mesa, CA
Senior Associate 2000 - 2011

Represented clients in federal and state courts, in connection with contract disputes, business torts, personal injury, wage and hour disputes, unfair competition/business practices, intellectual property (copyright and trademark), lender liability, breach of warranty and product liability. Attended hearings and depositions, performed research, drafted and respond to discovery requests, prepared and drafted law and motion, complaints and other court filings in federal and state courts. Filed trademark/copyright applications and prosecuted trademark applications through the United States Patent Trademark Office and Trademark Trial and Appeals Board to obtain trademark registration for clients.

Education

Western State University College of Law, Fullerton, California, Juris Doctor, May 1998

University of Arizona, Tucson, Arizona
Bachelor of Arts, May 1994, Major: Political Science, Minor: French

Admissions and Memberships

State Bar of California, November 1998, No. 197904

- U.S. District Courts in the Central, Southern, Northern Districts of California, U.S. Court of Appeals for the 9th Circuit and all California State Courts
- Robert A. Banyard, Inn of Court and Orange County Bar Association

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
3199 Airport Loop Drive, Suite A3, Costa Mesa, California 92626

A true and correct copy of the foregoing document described **SECOND INTERIM APPLICATION FOR FEES AND REIMBURSEMENT OF EXPENSES BY THOMAS VOGELE & ASSOCIATES, APC, COUNSEL FOR DEBTOR IN POSSESSION CORRALITOS FARMS, LLC; DECLARATIONS OF THOMAS A. VOGELE, ESQ. AND ROBERT F. KOONTZ IN SUPPORT THEREOF** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") – Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On 9/22/2016 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

- United States Trustee (SJ) USTPRegion17.SJ.ECF@usdoj.gov, ltroxas@hotmail.com
- Thomas A Vogele on behalf of Debtor tvogele@tvalaw.com
- Effie F. Anastassiou on behalf of Creditor K&M Enterprises, LLC effieesq@salinasaglaw.com; paralegal@salinasaglaw.com
- Joseph M. Welch on behalf of creditor Tom Lange jwelch@buchalter.com; dcyrankowski@buchalter.com
- William Brody on behalf of creditor Tom Lange wbrody@buchalter.com

☐ Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):

On 9/22/2016 I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 9/22/2016, I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

9/22/16

/s/ Lynn Marino

E: hbniles@hbniles.com

VIA OVERNITE EXPRESS

Judge Arthur S. Weissbrodt
 United States Bankruptcy Court
 Northern District of California
 United States Courthouse, Room 3035
 280 South First Street
 San Jose, CA 95113-3099

Attorney for Doug Brouwer
 AGCO Finance, LLC
 PO BOX 2000
 Johnston, IA 50131

Ally
 PO BOX 380902
 Minneapolis, MN 55438

VIA US MAIL

UNITED STATES TRUSTEE (SJ)
 80 S 1st St #268
 San Jose, CA 95113

American Portable Restrooms
 151 Kearney Street
 Watsonville, CA 95076

WILLIAM S. BRODY
 BUCHALTER NEMER A Professional Corporation
 1000 Wilshire Boulevard, Suite 1500
 Los Angeles, CA 90017
 T: (213) 891-0700 F: (213) 896-0400
 Email: wbrody@buchalter.com

Andrew Koontz
 8038 S. 174th Street
 Higley, AZ 85236

Anthem Blue Cross
 PO Box 9051
 Oxnard, CA 93031

JOSEPH M. WELCH
 BUCHALTER NEMER A Professional Corporation
 18400 Von Karman Avenue, Suite 800
 Irvine, CA 92612-0514
 T: (949) 760-1121 F: (949) 720-0182
 Email: jwelch@buchalter.com

Applied Industrial Technologies
 PO BOX 100538
 Pasadena, CA 91189

Armando Ramirez
 287 Carsserly Rod
 Watsonville, CA 95076
 E: aramirez@santacruzberry.com

Attorneys for Secured Creditors
 Tom Lange Company, Inc. and
 Tom Lange Company International, Inc.

Effie F. Anastassiou, Esq.
 Anastassiou & Associates
 PO BOX 2210
 Salinas, CA 93902

ARN Translations and Safety Support
 PO BOX 1661
 Freedom, CA 95019

Attorneys for K&M Enterprises, LLC

Azzie's Storage
 34 Roache Road
 Freedom, CA 95019

Henry B. Niles III, Esq.
 340 Soquel Avenue, Suite 105
 Santa Cruz, CA 95062
 T: (831) 457-4545
 F: (831) 457-4555

Bank of America Payments
 PO BOX 1509
 Wilmington, DE 19886-5019

In re: CORRALITOS FARMING, LLC

Debtor(s).

CHAPTER: 11

CASE NUMBER: 15-51772

Berkshire Hathaway Homestate Co.
PO BOX 846693
Los Angeles, CA 90084-6693

Boyer, Inc.
PO BOX 82
Watsonville, CA 95077

Cal Coast Irrigation, Inc.
1480 W. Stowell Road
Santa Maria, CA 93454

Cal Coastal Rural Development
221 Main Street, Suite 301
Salinas, CA 93901

Capital One
PO BOX 60599
City of Industry, CA 91716-0599

CAT Financial Commercial
PO BOX 905229
Charlotte, NC 28290-5229

Catto's Graphics, Inc.
111 Dubois Street
Santa Cruz, CA 95060

Central Coast Water Quality
PO BOX 1049
Watsonville, CA 95077

Collection Bureau of America
25954 Eden Landing Road
Hayward, CA 94545-5192

Comerica Bank
Watsonville Square Shopping Center
1998 Main St
Watsonville, CA 95076

Continental Western

PO BOX 2418
San Leandro, CA 94577

Crown Nursery, LLC
PO BOX 340
Red Bluff, CA 96080-0340

Cypress Ag Consulting
PO BOX 3597
Freedom, CA 95019

Daimler Truck Financial
PO BOX 5260
Carol Stream, IL 60197-5260

Daimler Truck Financial
13650 Heritage Parkway
Fort Worth, TX 76177

Davis Auto Parts A Corp.
245 Rodriguez Street
Watsonville, CA 95076

Duran Sales
135 Allison Street
Royal Oaks, CA 95076

EDD
Bay Area Collection Office
7677 Oakport Street, Suite 400
Oakland, CA 94621-1933

Employment Development Dept.
Bankruptcy Group MIC 92E
PO Box 826880
Sacramento, CA 94280-0001

FMG Farm Contractor, Inc.
PO BOX 1582
Gonzales, CA 93926

Ford Credit
PO BOX 552679

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

August 2010

F 9013-3.1.PROOF.SERVICE

Case: 15-51772 Doc# 297 Filed: 09/22/16 Entered: 09/22/16 12:43:24 Page 46 of 49

In re: CORRALITOS FARMING, LLC

Debtor(s).

CHAPTER: 11

CASE NUMBER: 15-51772

Detroit, MI 48255-2679

PO BOX 1464
Watsonville, CA 95077

Franchise Tax Board
Bankruptcy Section MS A-340
PO Box 2952
Sacramento, CA 95812-2952

Kanaka Peak Service
Attn: Beth Crandall
PO BOX 1287
Watsonville, CA 95077

G&H Farms, LLC
PO BOX 599
Salinas, CA 93902

Kubota Credit Corporation USA
PO BOX 894717
Los Angeles, CA 90189-4717

Green Rubber - Kennedy Ag
PO BOX 7488
Spreckels, CA 93962

Lakeside Organic Gardens, LLC
577 Judd Road
Watsonville, CA 95076

Green Waste Recovery, Inc.
PO BOX 11089
San Jose, CA 95103-1089

Lassen Canyon Nursery, Inc.
PO BOX 992400
Redding, CA 96099-2400

Grindstone Collections Strategies, Inc.
5500 NE 109th Court, Suite M
Vancouver, WA 98662

Maggiora Brothers Drilling, Inc.
595 Airport Blvd.
Watsonville, CA 95076

Harmon Systems International, LLC
2201 Coy Avenue
Bakersfield, CA 93307

Martin Montelongo
833 Holly Avenue
Clovis, CA 93611

Hitachi Capital America Corp.
21923 Network Pl
Chicago, IL 60673-1219
Industrias de Culiacan SA de CV
Federalismo S/N Las Flores Infonavit
Culiacan
Sinaloa, Mexico CP 80159

Noland, Hamerly, Etienne & Hoss
PO BOX 1012
Salinas, CA 93902

Norcal Nursery
PO BOX 1012
Red Bluff, CA 96080

Internal Revenue Service
Department of the Treasury
Ogden, UT 84201-0005

Organic Horticultural Amendments
PO BOX 2884
Watsonville, CA 95077

Julie Packard & Nancy Burnett
6551 Glen Haven Road
Soquel, CA 95073

Ottone Leach & Ray, LLP
17 East Gabilan Street
Salinas, CA 93901

K&M Enterprises, LLC

Pacific Ag Rental

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

August 2010

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In re: CORRALITOS FARMING, LLC

Debtor(s).

CHAPTER: 11

CASE NUMBER: 15-51772

820 Park Row #686
Salinas, CA 93901

Robert Stephens
PO BOX 874
Soquel, CA 95073

Pajaro Valley Fabrication
445 W. Beach Street
Watsonville, CA 95076

Rocha JR Berry Farms, LLC
PO BOX 1360
Watsonville, CA 95076

Pajaro Valley Laser Leveling, Inc.
577 Judd Road
Watsonville, CA 95076

Rodney Koontz
111 South 34th Street
Phoenix, AZ 85034

Pajaro Valley Printing
1827 Freedom Blvd.
Freedom, CA 95019

Salinas Valley Ford
795 Elvee Drive
Salinas, CA 93901

Praxair Distribution, Inc.
5312 N. Irwindale Avenue - Suite #1A
Irwindale, CA 91706

Sambrailo Packaging
PO BOX 50090
Watsonville, CA 95077

PV Water Management Agency
36 Brennan Street
Watsonville, CA 95076

Santa Cruz Berry Farming Company, LLC
116 Martinelli Street
Watsonville, CA 95077

Quiedan Company, Inc.
15400 Meridian Road
Salinas, CA 93907

Sierra Cascade Nursery
472-715 Johnson Road
Susanville, CA 96130

RDO Equipment Co.
10108 Riverford Road
Lakeside, CA 92040

Soil Control Lab
42 Hangar Way
Watsonville, CA 95076

Renteria's Tire Service
300 Salinas Road
Watsonville, CA 95076

Sprint
PO BOX 8077
London, KY 40742

Richard Jon Gurnee, Switzer Trust,
Etheleen Callender Trust
724 Brewington Avenue
Watsonville, CA 95076

State Board of Equalization
PO Box 942879
Sacramento, CA 94279

Robert Fritz Koontz
29 Prendergast Lane
Watsonville, CA 95076

Sturdy Oil Company
c/o Berlette Sephens
PO BOX 90
Salinas, CA 93902-0090

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

August 2010

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In re: CORRALITOS FARMING, LLC

Debtor(s).

CHAPTER: 11

CASE NUMBER: 15-51772

TCF Equipment Finance, Inc.
2695 N. Fowler Avenue, Suite 110
Fresno, CA 93727-8650

Tom Lange Company, Inc.
Tom Lange Company International, Inc.
5231 South 6th St Road
Springfield, IL 62701

Trical, Inc.
PO BOX 1327
Hollister, CA 95024-1327

U.S. Irrigation
3876 Old Allen Road
Bakersfield, CA 93314

Uline Shipping Supplies
PO BOX 88741
Chicago, IL 60680-1741

Ullman Electric Co.
151 Rancho Road
Watsonville, CA 95076

Veda Farming Solutions
1053 Abbott Street
Salinas, CA 93901

Waste Management
PO BOX 541065
Los Angeles, CA 90054-1065

Water U Want
2037 N, Main Street
Salinas, CA 93906

Wendal Rosen Black & Dean, LLP
PO BOX 2047
Oakland, CA 94607

Zenith Insurance Company
File 50004
Los Angeles, CA 90074-0004

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

August 2010

F 9013-3.1.PROOF.SERVICE

Case: 15-51772 Doc# 297 Filed: 09/22/16 Entered: 09/22/16 12:43:24 Page 49 of 49